

**BEFORE THE  
PUBLIC SERVICE COMMISSION OF  
SOUTH CAROLINA**

**IN RE:** Petition of the South Carolina Telephone Coalition For a Determination that Wireless Carriers are Providing Radio-Based Local Exchange Services in South Carolina that Compete with Local Telecommunications Service Provided in the State )  
DOCKET NO. 2015-290-C

**FRONTIER COMMUNICATIONS OF THE CAROLINAS, LLC'S  
STATEMENT ADDRESSING CTIA'S MOTION**

On September 28, 2015, CTIA – The Wireless Association (“CTIA”) filed a Motion to Dismiss, or, in the Alternative, Expand Scope of Proceeding, and to Suspend Case Schedule (“Motion”). On October 2, 2015, the Petitioner South Carolina Telephone Coalition (“SCTC”) filed its Response to Motion to Dismiss, or, in the Alternative, Expand Scope of Proceeding, and to Suspend Case Schedule (“Response”).

As a party<sup>1</sup> in this Docket, Frontier Communications of the Carolinas, LLC (“Frontier”) agrees with SCTC that the Motion should be denied and, without necessarily adopting the SCTC’s response in every aspect or detail, Frontier does not have anything further to add beyond the reasons so thoroughly stated by SCTC.

Respectfully submitted, this 12<sup>th</sup> day of October, 2015.

By: 

C. Jo Anne Wessinger Hill, Esquire  
Steven W. Hamm, Esquire  
RICHARDSON, PLOWDEN & ROBINSON, P.A.  
P.O. Drawer 7788 (1900 Barnwell Street, 29201)  
Columbia, South Carolina 29202

803-771-4400

*ATTORNEYS FOR FRONTIER COMMUNICATIONS OF  
THE CAROLINAS, LLC*

October 12<sup>th</sup>, 2015  
Columbia, South Carolina.

<sup>1</sup> Order No. 2015-710 of the South Carolina Public Service Commission

**BEFORE  
THE PUBLIC SERVICE COMMISSION OF  
SOUTH CAROLINA  
DOCKET 2015-290-C**

IN RE:

PETITION OF THE SOUTH CAROLINA )  
TELEPHONE COALITION FOR A )  
DETERMINATION THAT WIRELESS )  
CARRIERS ARE PROVIDING RADIO- )  
BASED LOCAL EXCHANGE )  
SERVICES IN SOUTH CAROLINA )  
THAT COMPETE WITH LOCAL )  
TELECOMMUNICATIONS SERVICE )  
PROVIDED IN THE STATE )

---

**CERTIFICATE OF SERVICE**

This is to certify that I, C. Jo Anne Wessinger Hill, an attorney with the firm of Richardson Plowden & Robinson, PA, have on October 12, 2015, served one (1) copy of the foregoing document, **Frontier Communications of the Carolinas, LLC's, Statement Addressing CTIA's Motion**, filed on behalf of Frontier Communications of the Carolinas, LLC, in the above-referenced matter to the person(s) named below by causing said copy to be served as follows:

**VIA ELECTRONIC MAIL ONLY**

The Honorable Jocelyn G. Boyd, Esquire  
Chief Clerk & Administrator  
**The Public Service Commission of South  
Carolina**  
101 Executive Center Drive (29210)  
Post Office Drawer 11649  
Columbia, South Carolina 29210  
[Jocelyn.boyd@psc.sc.gov](mailto:Jocelyn.boyd@psc.sc.gov)

**VIA ELECTRONIC MAIL ONLY**

Jeffrey M. Nelson, Esquire  
Andrew M. Bateman, Esquire  
C. Lessie Hammonds, Esquire  
**Office of Regulatory Staff**  
1401 Main Street, Suite 900  
Columbia, South Carolina 29201  
[jnelson@regstaff.sc.gov](mailto:jnelson@regstaff.sc.gov)  
[abateman@regstaff.sc.gov](mailto:abateman@regstaff.sc.gov)  
[lhammon@regstaff.sc.gov](mailto:lhammon@regstaff.sc.gov)

**VIA ELECTRONIC MAIL ONLY**

M. John Bowen, Jr., Esquire  
Margaret M. Fox, Esquire  
**South Carolina Telephone Coalition**  
McNair Law Firm, PA  
Post Office Box 11390  
Columbia, South Carolina 29211  
[jbowen@mcnair.net](mailto:jbowen@mcnair.net)  
[pfox@mcnair.net](mailto:pfox@mcnair.net)

**VIA ELECTRONIC MAIL ONLY**

Charles L.A. Terreni, Esquire  
**South Carolina Telephone Coalition**  
Terreni Law Firm, LLC  
1508 Lady Street  
Columbia, South Carolina 29201  
[Charles.terreni@terrenilaw.com](mailto:Charles.terreni@terrenilaw.com)

**VIA ELECTRONIC MAIL ONLY**

Scott Elliott, Esquire  
**United Telephone Company d/b/a Century Link**  
ELLIOTT & ELLIOTT, P.A.  
1508 Lady Street  
Columbia, South Carolina 29201  
[selliott@elliottlaw.com](mailto:selliott@elliottlaw.com)

**VIA ELECTRONIC MAIL ONLY**

Frank R. Ellerbe, III, Esquire  
Bonnie D. Shealy, Esquire  
**South Carolina Cable Television Association**  
Post Office Box 944  
Columbia, South Carolina 29202  
[fellerbe@robinsonlaw.com](mailto:fellerbe@robinsonlaw.com)  
[bshealy@robinsonlaw.com](mailto:bshealy@robinsonlaw.com)

**VIA ELECTRONIC MAIL ONLY**

William E. DuRant, Jr., Esquire  
Schwartz, McLeod, DuRant & Jordan  
10 Law Range  
Sumter, South Carolina 29150  
[gduurant@legaloff.net](mailto:gduurant@legaloff.net)

**VIA ELECTRONIC MAIL ONLY**

Patrick W. Turner, Esquire  
675 West Peachtree Street, NW  
Room 4323  
Atlanta, Georgia 30308  
[Pt1285@att.com](mailto:Pt1285@att.com)

**VIA ELECTRONIC MAIL ONLY**

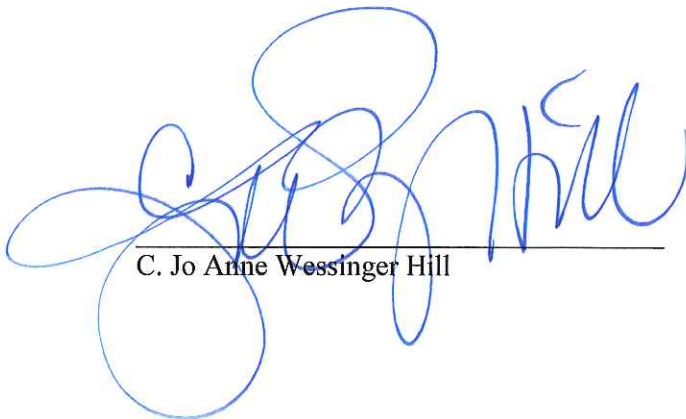
Burnet R. Maybank, III, Esquire  
**Windstream South Carolina, LLC,  
and Windstream Nuvox, LLC**  
1230 Main Street, Suite 700  
Columbia, South Carolina 29201  
[BMaybank@nexsenpruet.com](mailto:BMaybank@nexsenpruet.com)

**VIA ELECTRONIC MAIL ONLY**

Jeanne W. Stockman, Esquire  
CenturyLink  
14111 Capital Blvd.- NCWKFR0313  
Wake Forest, North Carolina 27587  
[Jeanne.w.stockman@centurylink.com](mailto:Jeanne.w.stockman@centurylink.com)

**VIA ELECTRONIC MAIL ONLY**

John J. Pringle, Jr., Esquire  
Adams and Reese, LLP  
1501 Main Street, Suite 500  
Columbia, South Carolina 29201  
[Jack.pringle@arlaw.com](mailto:Jack.pringle@arlaw.com)



C. Jo Anne Wessinger Hill

October 12, 2015  
Columbia, South Carolina